

PINE TELEPHONE SYSTEM, INC.

HEADQUARTERS

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February 19, 2014

***Via Overnight Delivery to:
9300 East Hampton Drive
Capitol Heights, MD 20743***

*Received & Inspected
FEB 20 2014
FCC Mail Room*

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Annual CPNI Certification; EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed for filing you will find the original and 4 copies of Pine Telephone System, Inc.'s Annual CPNI Certification; EB Docket No. 06-36. I have also enclosed the first page only of the filing for verification of receipt by the FCC. Please date it and return it to the corporate office in the enclosed, self-addressed stamped envelope provided for your convenience.

Thank you for your assistance.

Sincerely,



John B. Hemphill, Vice President
Pine Telephone System, Inc.

JBH/jl
Enclosure(s)

No. of Copies rec'd 0+4
List ABCDE

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2013

Date filed: February 18, 2014

Name of company covered by this certification: Pine Telephone System, Inc.

Form 499 Filer ID: 801174

Name of signatory: John B. Hemphill

Title of signatory: Vice-President, Pine Telephone System, Inc.

CERTIFICATION OF COMPLIANCE

I, John B. Hemphill, being over 21 years of age and under oath state that I am the Vice President of Pine Telephone System, Inc. I represent that I am authorized as Pine's agent to execute this certification on behalf of Pine Telephone System, Inc., and based upon my personal knowledge the facts set forth in this certification are true and demonstrate that Pine Telephone System, Inc. ("Pine") has established operating procedures that are adequate to ensure compliance with the rules of the Federal Communications Commission set forth in 47 C.F.R. §64.2001 *et seq.*

This certification and the attached Exhibit A explain how the operating procedures of Pine Telephone System, Inc. are in compliance with 47 C.F.R. §64.2001 *et seq.* and is filed pursuant to 47 C.F.R. §64.2001, *et seq.* and to 47 C.F.R. §64.2009(e).

All Pine employees use CPNI in compliance with 47 C.F.R. §64.2005 and not otherwise. Personnel employed in the company's marketing and billing sections have been educated on the conditions under which CPNI may be shared in order for Pine to market services to customers and what information may not be shared pursuant to 47 C.F.R. §64.2005. Pine does no marketing to its customers using CPNI. All marketing by Pine in 2013 was by utilizing subscriber list information only. Pine makes no disclosure of any CPNI to any third party for marketing purposes.

Pine does not provide CPNI under the notice and approval procedure set forth in 47 C.F.R. §64.2007 for broader use of CPNI. No CPNI is released over the telephone in a customer-initiated call, but only in a telephone call initiated by the company to the customer at the telephone number of record in the company's accounts, pursuant to 47 C.F.R. §64.2010(b).

In 2013, there were no instances of attempted access to CPNI by data brokers or actions taken by Pine against data brokers for the year.

In 2013, Pine received no customer complaints concerning the unauthorized release of CPNI during the year.

A statement explaining how the operating procedures of Pine Telephone System, Inc. ensure that it is in compliance with these rules of the FCC is attached as Exhibit A and includes the items required to be reported under 47 C.F.R. §64.2009(e). The statement also elaborates on how CPNI was protected in the year 2013.

Pine represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. Pine also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.

PINE TELEPHONE SYSTEM, INC.

By: John B. Hemphill

Its: Vice President

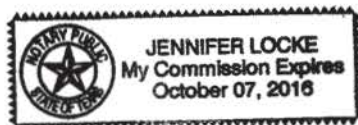
Date: February 18, 2014

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State of Texas §
 §
County of Tom Green §

On this 18th day of February, 2014, before me, the undersigned, a Notary Public in and for the State of Texas, duly commissioned and sworn, personally appeared John B. Hemphill, to me known to be the Vice President of Pine Telephone System, Inc., the corporation that executed the within and foregoing instrument, and acting in such capacity he acknowledged said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute said instrument, and that the seal affixed is the corporate seal of said corporation.

Witness my hand and official seal hereto affixed that day and year first above written.



Jennifer Locke
Jennifer Locke

Notary Public, State of Texas,
My commission expires October 7, 2016.

Attachments: Exhibit A "Pine Telephone System, Inc. Compliance Explanation"

EXHIBIT A
PINE TELEPHONE SYSTEM, INC.
COMPLIANCE EXPLANATION

Pine Telephone System, Inc. ("Pine") in 2013, used the following safeguards and procedures to protect the customer proprietary network information ("CPNI") of Pine's customers.

Pine has in place a company policy that no account information is released on any customer-initiated or third-party-initiated telephone call. The only way Pine CPNI is released is (a) through a telephone call initiated by Pine to the customer at the telephone number of record for that respective customer, (b) through sending information to the customer at the address for the telephone number of record or (c) through disclosure in person to the customer after satisfactory verification of identity by photo I.D. Pine sends out an annual notice to all its customers that explains what CPNI is, how it is protected, and how the customers may obtain their CPNI from Pine.

No online account access is provided to customer accounts. No CPNI is released to any person through any password system.

All employees of Pine who have access to CPNI receive training in a seminar on how to protect CPNI. Pine maintains and updates an employee handbook on how to handle any matters involving CPNI.

Pine does not use or disclose to any other persons any CPNI for sales or marketing campaigns. Thus, because there have been no disclosures of CPNI to third parties or allowed access to third parties for sales or marketing, there are no records of disclosures.

Pine's accountant, Bruce Goslovich, Pine's auditor, Moss Adams and Pine's contract billing company, MACC, have been advised of the restrictions on disclosure of CPNI, and have signed certifications that they have made no disclosures of any CPNI acquired while working for Pine Telephone.

Pine's marketing operations for new services in 2013 did not use any CPNI, but were instead included as an insert along with monthly bills and thus solely based on subscriber list information.

In 2013, Pine upgraded its Internet service throughout all exchanges and offered higher speeds all of which were marketed via inserts into the monthly bills. Pine also began offering in home camera service which was marketed in the same manner.

Pine Telephone's website was expanded so that customers could make payments through the website using their credit card. The third party clearing house, PAYDQ, has a secure customer payment portal into which the **Pine customer** enters their username or account number in order to make a payment. PAYDQ simply transfers the funds and related account number to Pine. Pine Telephone does not store any of the customer account

information or other CPNI on PAYDQ's servers. The Pine Telephone webpage merely redirects the customer to PAYDQ's website to enter information and pay their bill.

Pine's disciplinary process for unauthorized disclosures is expressly stated in Pine's CPNI Compliance Manual. Any employee who violates the rules against unauthorized disclosure of CPNI is subject to disciplinary action, specifically loss of a day's pay for each occurrence and possible termination of employment.